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1914 - 1999

\*LIMITED TO PRACTICE BEFORE  
FEDERAL AGENCIES AND COURTS

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October 21, 1999

**BY HAND DELIVERY**

Magalie Roman Salas, Secretary  
Office of the Secretary  
Federal Communications Commission  
The Portals, 445 Twelfth Street, S.W.  
Room TW-A325  
Washington, DC 20554

WRITER'S DIRECT DIAL NO.

RECEIVED  
OCT 21 1999  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Relicensing of Certain Part 90 Frequencies  
to Require Spectrally Efficient Use / RM-9705

Dear Ms. Salas:

Enclosed you will find an original and four copies of an "Erratum to Opposition to Petition for Rulemaking" filed with respect to the above-referenced proceeding.

If you have any questions regarding this matter, please do not hesitate to contact this office.

Respectfully submitted,



John A. Prendergast  
Laura A. Otis

Enclosure

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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of )  
 )  
Relicensing of Certain Part 90 Frequencies ) RM-9705  
To Require Spectrally Efficient Use )

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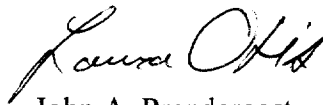
**TO: The Commission**

**ERRATUM TO  
OPPOSITION TO PETITION FOR RULEMAKING**

On September 23, 1999, the law firm of Blooston, Mordkofsky, Jackson & Dickens ("BMJ&D") filed an "Opposition to Petition for Rulemaking" ("Opposition") in the above-captioned proceeding.

BMJ&D is filing this erratum to correct a typographical error found in the caption on the cover and first page of its Opposition. BMJ&D referred to "RM No. 9075" when the correct rulemaking number is **9705**. Replacement pages reflecting this correction are attached.

Respectfully submitted,



John A. Prendergast  
Laura A. Otis  
Blooston, Mordkofsky, Jackson & Dickens  
2120 L Street, N.W., Suite 300  
Washington, D.C. 20037

October 21, 1999

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Relicensing of Certain Part 90 Frequencies	)	RM-9705
To Require Spectrally Efficient Use	)	

**TO: The Commission**

**OPPOSITION TO PETITION FOR RULEMAKING**

John A. Prendergast  
Laura A. Otis  
Blooston, Mordkofsky, Jackson & Dickens  
2120 L Street, N.W., Suite 300  
Washington, D.C. 20037

September 23, 1999

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Relicensing of Certain Part 90 Frequencies	)	RM No. 9705
To Require Spectrally Efficient Use	)	

**TO: The Commission**

**OPPOSITION TO PETITION FOR RULEMAKING**

The law firm of Blooston, Mordkofsky, Jackson & Dickens, on behalf of its clients listed in Attachment A hereto, and pursuant to Section 1.405 of the Commission's Rules, hereby submits its comments opposing the Petition for Rulemaking (hereinafter "Petition") filed by the American Mobile Telecommunications Association ("AMTA") on July 30, 1999 in the above-captioned proceeding.<sup>1</sup>

**I. Statement of Interest**

Our clients include companies as large as Minnesota Mining and Manufacturing Co. ("3M"), which efficiently uses private radio operations carefully tailored to cover its manufacturing facilities; and many small and mid-sized companies that depend on private radio for internal communications necessary to carry on their business. Many of our clients are rural telephone or electric companies, which use their radios to ensure the

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<sup>1</sup> American Mobile Telecommunications Association, Inc., *Petition for Rulemaking*, (July 30, 1999) ("AMTA's Petition").

## **CERTIFICATE OF SERVICE**

I, Laura A. Otis, an attorney at the law office of Blooston, Mordkofsky, Jackson & Dickens, hereby certify that on this 21<sup>st</sup> day of October, 1999, I caused to be hand-delivered a copy of the foregoing "Erratum to Opposition to Petition for Rulemaking" to each of the following:

Chairman William E. Kennard  
Federal Communications Commission  
445 12th St. S.W., Room 8-B201  
Washington DC 20554

Commissioner Susan Ness  
Federal Communications Commission  
445 12th St. S.W., Room 8-B115  
Washington DC 20554

Commissioner Gloria Tristani  
Federal Communications Commission  
445 12th St. S.W., Room 8-C302  
Washington DC 20554

Commissioner Harold Furchgott-Roth  
Federal Communications Commission  
445 12th St. S.W., Room 8-A302  
Washington DC 20554

Commissioner Michael Powell  
Federal Communications Commission  
445 12th St. S.W., Room 8-A204  
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Thomas Sugrue, Chief  
Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12th St. S.W., Room 3-C252  
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Steve Weingarten, Chief  
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Washington, D.C. 20037

\* Via first-class mail

  
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Laura A. Otis